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18 UNITED STATES DISTRICT COURT
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20 DISTRICT OF NEVADA

21 ORACLE USA, INC., a Colorado corporation;
22 ORACLE AMERICA, INC., a Delaware
23 corporation; and ORACLE INTERNATIONAL
24 CORPORATION, a California corporation,

25 Plaintiffs,
26 v.

27 RIMINI STREET, INC., a Nevada corporation;
28 SETH RAVIN, an individual,

29 Defendants.

Case No 2:10-cv-0106-LRH-VCF

**ORACLE'S MOTION TO SEAL
PORTIONS OF REPLY IN SUPPORT
OF ORACLE'S RENEWED MOTION
FOR ATTORNEYS' FEES**

1 Pursuant to the Stipulated Protective Order governing confidentiality of documents
 2 entered by the Court on May 21, 2010, ECF No. 55 (“Protective Order”), and Rules 5.2 and
 3 26(c) of the Federal Rules of Civil Procedure, Plaintiffs Oracle USA, Inc., Oracle America, Inc.,
 4 and Oracle International Corporation (collectively “Oracle”) respectfully request that the Court
 5 order the Clerk of the Court to file under seal certain portions of Oracle’s Reply In Support Of
 6 Oracle’s Renewed Motion for Attorneys’ Fees (“Reply Brief”). These portions of Oracle’s
 7 Reply Brief reflect information that Oracle, Rimini Street, Inc. (“Rimini”) or a third party has
 8 designated “Confidential” or “Highly Confidential - Attorneys’ Eyes Only” under the Protective
 9 Order. A public, redacted version of Oracle’s Reply Brief was filed on June 1, 2018, *see* ECF
 10 No. 1152, and an unredacted version will be filed under seal with the Court.

11 The Protective Order states, “Counsel for any Designating Party may designate any
 12 Discovery Material as ‘Confidential Information’ or ‘Highly Confidential Information –
 13 Attorneys’ Eyes Only’ under the terms of this Protective Order **only if such counsel in good**
 14 **faith believes that such Discovery Material contains such information and is subject to**
 15 **protection under Federal Rule of Civil Procedure 26(c).** The designation by any Designating
 16 Party of any Discovery Material as ‘Confidential Information’ or ‘Highly Confidential
 17 Information – Attorneys’ Eyes Only’ shall constitute a representation that an attorney for the
 18 Designating Party reasonably believes there is a valid basis for such designation.” Protective
 19 Order ¶ 2 (emphasis supplied).

20 Rimini has designated information in Oracle’s Reply Brief as Highly Confidential -
 21 Attorneys’ Eyes Only (“HC”). Oracle submits portions of the Reply Brief containing such
 22 information under seal pursuant to the Protective Order based on Rimini’s representation that it
 23 reasonably believes there is a valid basis under the Protective Order for its confidentiality
 24 designations. Because the information was designated by Rimini, Oracle is not in a position to
 25 explain why filing the redacted portions of the Reply Brief publicly would cause Rimini harm.

26 Oracle has submitted all other portions of Oracle’s Reply Brief to the Court’s public files,
 27 which allow public access to all materials except for the portions discussed above. Accordingly,
 28 the request to seal is narrowly tailored. For the foregoing reasons, Oracle respectfully requests

1 that the Court grant leave to file under seal the documents discussed above.

2 DATED: June 1, 2018 Morgan, Lewis & Bockius LLP

3 By: /s/ Thomas S. Hixson

4 Thomas S. Hixson

5 Attorneys for Plaintiffs

Oracle USA, Inc.,

Oracle America, Inc. and

Oracle International Corporation

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CERTIFICATE OF SERVICE

2 I certify that on June 1, 2018, I electronically transmitted the foregoing ORACLE'S
3 MOTION TO SEAL PORTIONS OF REPLY IN SUPPORT OF ORACLE'S RENEWED
4 MOTION FOR ATTORNEYS' FEES to the Clerk's Office using the Electronic Filing System
5 pursuant to Special Order No. 109.

6 Dated: June 1, 2018 Morgan, Lewis & Bockius LLP

Morgan, Lewis & Bockius LLP

By: /s/ Thomas Hixson
Thomas Hixson

Attorneys for Plaintiffs
Oracle USA, Inc.,
Oracle America, Inc. and
Oracle International Corporation